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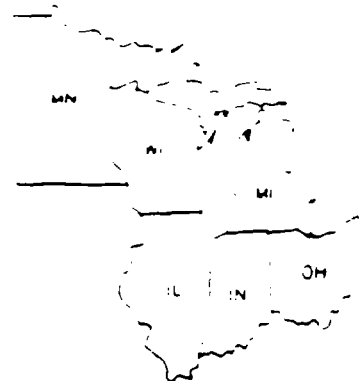
United States Environmental Protection Agency

Region V

77 West Jackson Boulevard  
Chicago, Illinois 60604

Superfund Division

Facsimile Cover Sheet  
Telephone Number  
312-886-4071



To: MR. TERRY CASEY

Office phone: 281-351-9441 Machine No: 281-351-9447

From: Gwen Massenburg

Office phone: 312-886-0983 Mail code: SR-6J

Date: 10/11/02

Number of pages,  
including cover:

8

Message: Here are the comments to  
the MMI WORK PLAN, MARCH 2002  
your email allocation will NOT  
allow me to send these  
electronically.

Please, call me if you have  
question.

Signature: \_\_\_\_\_



**Gwendolyn  
Massenburg**

10/10/2002 03:26 PM

To: tscasey\_cay@msn.com  
cc: pvojack@entact1.com, Susan Prout/R5/USEPA/US@EPA,  
DONALD BRUCE/R5/USEPA/US@EPA,  
sheila.abraham@epa.state.oh.us  
Subject: Re: FW: Master Metals Cleveland

Mr. Casey,

Ms Vojack sent me an electronic copy of the changes made to the the Jan. 2002, Removal Design/Removal Work Plan and the Pre-Final Design and Construction Quality Assurance Plan for Master Metals that were incorporated into the March 2002, Removal Design/Removal Work Plan and the Pre-Final Design and Construction Quality Assurance Plan for Master Metals. Based on the review of the March 2002 documents, it appears that all of the strikeouts and new text added were correctly done, however, the changes only addressed the comment raised during the conference call we (U. S. EPA, Ohio EPA, ENTACT, NOLTCO, etal) had back in Jan. 2002. Attached to this email are the comments sent to you via email on January 4, 2002, which were not addressed or incorporated into the March 2002 deliverable.

As a suggestion, in order to expedite the review process, if you would ask ENTACT to remove all of the redline strikeouts, and also change the red underlined text (the knockout corrections) back to the normal text color (black) from the documents sent attached to ENTACT's email below. Make the new suggested changes I am sending today then resubmit another redline knockout/blue underlined text (the knockout corrections) addressing the comments, to the Agencies, via email, it would help the review and approval process go much quicker. As you will see most of the comments are straightforward and to the point, however, if you have any questions or need additional clarification, to the comments, the Agencies would be more than happy to discuss them with you in a conference call.

Presently, U.S. EPA is providing you with an "approval with modifications" to the March 2002 document. A revised copy of the document should be generated incorporating all of the modifications, including the modifications to the QAPP (see the attachment below entitled "2-19-02RD\_RAQAPPresponse"). The QAPP modifications does not have to be completed immediately, so that the work plan modifications do not get held up.

Again, if you have any questions or need additional information please do not hesitate to contact me.

Sincerely,

Gwendolyn Massenburg  
Remedial Project Manager  
U. S. EPA  
77 W. Jackson Blvd.  
Chicago, IL 60604  
312-886-0983 (v)  
312-886-4071 (f)



Oct. 10, 2002 work plan comments March doc



2-19-02RD\_RAQAPPresponse.wp



postmaster@msn.co  
m  
10/10/2002 04:41  
PM

To: Gwendolyn Massenburg/R5/USEPA/US@EPA  
cc:  
Subject: Delivery Status Notification (Failure)

This is an automatically generated Delivery Status Notification.  
Delivery to the following recipients failed.  
tscasey\_cay@hotmail.msn.com

Reporting-MTA: dns;cpimssmtpa09.msn.com  
Received-From-MTA: dns;myrtle.rtpnc.epa.gov  
Arrival-Date: Thu, 10 Oct 2002 14:41:35 -0700  
Final-Recipient: rfc822;tscasey\_cay@hotmail.msn.com  
Action: failed  
Status: 5.0.0  
Diagnostic-Code: smtp;552 Requested action not taken: exceeded storage allocation

----- Message from Massenburg.Gwendolyn@epamail.epa.gov on Thu, 10 Oct 2002 16:36:30 -0500 -----

**To:** tscasey\_cay@msn.co  
m

**Subject** Master Metals  
:

Mr. Casey,  
Below are the documents that was making the previoud e-mail too large so, I am sending the attachments that Ms. Vojack sent in her e-mail. If you have any questions please do not hesitate to ask.

Sincerely,

(See attached file: redlined Fnl\_wkpln.doc) (See attached file: redlined Mar 2002 Final PSVP.doc) (See attached file: redlined Final FSAP.doc) (See attached file: redlined FINAL DESIGN - Feb 2002.doc)

Gwendolyn Massenburg  
Remedial Project Manager  
U. S. EPA  
77 W. Jackson Blvd.  
Chicago, IL 60604  
312-886-0983 (v)  
312-886-4071 (f)



redlined Fnl\_wkpln.do redlined Mar 2002 Final PSVP.d redlined Final FSAP.do



redlined FINAL DESIGN - Feb 2002.d

Pat Vojack <pvojack@entact1.com>



**Pat Vojack**  
<pvojack@entact1.com>  
m>

To: Gwendolyn Massenburg/R5/USEPA/US@EPA  
cc:  
Subject: FW: Master Metals Cleveland

10/02/02 01:30 PM  
Please respond to  
pvojack

Gwen,

resending this.

pat

-----Original Message-----

From: Pat Vojack [mailto:pvojack@entact1.com]  
Sent: Wednesday, October 02, 2002 12:57 PM  
To: 'massenberg.gwendolyn@epa.gov'  
Cc: 'tscasey\_cay@email.msn.com'  
Subject: Master Metals Cleveland

Gwen,

Attached are the redline/strikeout copies of the documents contained in the Master Metals Final RD/RA Workplan, dated March 2002. I have included the Workplan, Appendix B- PSVP, Appendix C-FSAP, and the Final Design per our phone conversation yesterday. If you need any other attachments please let me know. All maps, tables, figures and design drawings are included within the March 2002 Final RD/RA Workplan.

Once you have completed your review and provided comments, revisions will be made as necessary and a new project schedule will be generated to reflect the updated field work.

Please feel free to call me, Gwen, if you have any questions or have difficulty accessing these files at (630) 616-2100.

Pat Vojack  
ENTACT & Associates LLC  
1360 N. Wood Dale Rd, Suite A  
Wood Dale, IL 60191



redlined Fnl\_wkplan.doc redlined Mar 2002 Final PSVP.doc redlined Final FSAP.doc



redlined FINAL DESIGN Feb 2002.doc

**U.S. EPA's and OHIO EPA's ("Agencies") COMMENTS ON THE MARCH 2002 DRAFT  
REMOVAL DESIGN / REMOVAL ACTION REPORT FOR THE MASTER METALS, INC. SITE**

1. **General Comment:** The Agencies assume that the potential site re-user, Northern Ohio Lumber and Timber Company (NOLTCO), is in agreement with those aspects of the removal design plan related to site re-use (i.e., "cap" areas and technical specifications).
2. **General Comment:** All references in the Final Removal Design/ Removal Action Workplan and the Final Design and Construction Quality Assurance Plan, including appendices, should be updated to refer to the "final" documents (versus "PreFinal" or "draft").
3. **Section 1.1, Purpose and Objectives (Page 1):** End the first sentence after Cleveland, Ohio. Then add the following sentence: On September 22, 2000, U.S. EPA issued a modified remedy Action Memorandum, which changed the project scope to accommodate the Prospective Purchasers' planned redevelopment of the MMI facility.
4. **Section 1.2, 3<sup>rd</sup> paragraph (Page 2):** In the 3<sup>rd</sup> sentence of this paragraph, delete "with the exception of the roundhouse". And replace with: " a portion of the roundhouse that is *not* part of the Master Metals Site is occupied by a railroad preservation society."
5. **Section 1.3.1 (Page 2):** All references to the 2001 AOC and the Statement of Work (SOW) should be updated with the effective date of the AOC "September 2002." This comment is also applicable to Section 7.0 (References) and Appendices C, F and G, and anywhere the draft 2001 order is referenced.
6. **Section 1.3.1, 8<sup>th</sup> paragraph (Page 2):** The property ownership discussion should be updated to reflect the current ownership (NOLTCO).
7. **Section 1.3.2, 3<sup>rd</sup> paragraph, 3<sup>rd</sup> sentence (Page 4):** Add "for ultimate disposal" after "on the facility property."
8. **Section 1.4.2, 6<sup>th</sup> paragraph (Page 6), last sentence:** Add "current" before "concern." At the end of the paragraph, add "the Master Metals site lies within the "Industrial Valley Area" (ID 98USD013) Urban Setting Designation (USD) that the City of Cleveland requested and obtained from Ohio EPA's Voluntary Action Program, pursuant to Ohio Administrative Code 3745-300-10(D). The USD is based on the urban nature of the area, the availability and widespread use of public drinking water supplies, and the lack of use of the ground water in the area for drinking purposes."
9. **Section 1.4.2, 7<sup>th</sup> paragraph (Page 7); Section 4.5, 1<sup>st</sup> paragraph (Page 19); Appendix B, Section 2.0 (Page 3) and PVSP Tables:** All removal activities are undertaken, per the National Contingency Plan (NCP), on-site<sup>1</sup>. Therefore "on-property" and "off-property" should be replaced by "on-site" and "off-site," as appropriate.
10. **Section 1.4.2, last paragraph (Page 7), last sentence:** To the sentence ending with, "good construction practices "add "to control fugitive dust emissions and minimize contaminated surface water runoff."

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<sup>1</sup>The NCP defines the "Site" as the areal extent of contamination and all areas in very close proximity to the contamination necessary for the implementation of the response action.

11. **Section 1.5, 2<sup>nd</sup> bullet (Page 7), second sentence:** Based on the interpretation of Figures 2 and 5, the only areas to be paved with asphalt, not already covered with concrete, are the pits located in the concrete pad, and the brick road area. There is concern about whether the proposed four inches of asphalt cover, alone, will have adequate support/durability to carry heavy truck traffic for long periods of time. Therefore, the Agencies recommend adding a base course to any area off of the concrete pad, before laying the asphalt. However, it is acceptable the concrete from the demolition debris as fill, to bring these areas back up to grade before placing the base course.

The Agencies recommends that the base course immediately under the asphalt adhere to the standards listed in Section 400 of ODOT's Pavement Design and Rehabilitation Manual. That section, along with the ODOT Construction and Material Specification, describes the appropriate materials to be placed directly under asphalt pavement.

The following language should be added to the specifications : "In all areas off of the existing concrete pad, the asphalt cover shall be underlain by a base course layer adequate to support the intended vehicle traffic. The specification of the base course shall be consistent with the standards listed in Section 400 of ODOT's Pavement Design and Rehabilitation Manual."

12. **Section 1.5, 4th bullet (Page 7):** Add to the last sentence, "with conformational laboratory analysis."
13. **Section 1.5, 2nd bullet (Page 8):** Add to the last sentence, "with conformational laboratory analysis."
14. **Section 1.5, 5th bullet (Page 8):** Add the significant crack definition discussed in a previous conference call: "Fully penetrating the existing concrete surfaces with a width greater than ½ inch."
15. **Section 1.5, 8th bullet (Page 8):** Add the height of fence.
16. **Section 2.2 Management Responsibilities, USEPA CERCLA Remedial Project Manager:** Correct the spelling of Massenburg, also in Appendix G, and anywhere else in the document.
17. **Section 4.1 (Page 16):** Revised the first sentence to include NOLTCO to the list of parties involved in both the pre-construction and post-construction meetings.
18. **Section 4.2, Figure 4-1:** Figure 4 -1 is illegible, and does not provide a clear general layout of the Site. If Figure 4 -1 is to be retained, Figure 1-3 should be overlaid over Figure 4 -1, to support the delineation of the areas that will be excavated, versus the areas where asphalt will be laid over concrete, and where the concrete will be refurbished. However, it is simpler to refer to figures 04 and 05 in the Final Design and Quality Assurance Project Plan. Finally, the exclusion zone, contamination reduction or decontamination zone, and support zone are not shown on any of the figures. These zones should be added in the figure.
19. **Section 4.2.2 (Page 17); Section 4.5 (Page 20); Appendix B Section 5.0 (Page 5):** The SOW (Section 1.1) calls for the lead stabilization process to be carried out in secondary containers. This should be added explicitly into the reference to the "treatment containment

area" in the workplan.

20. **Section 4.2.7 (Page 19):** The Agencies have previously commented that Figure 4-1 is unclear and does not adequately define the coordinate grid system (CGS). Also, the western perimeter does not appear to be included and it is unclear why sampling and excavation would be necessary over the concrete. This figure also conflicts with the CGS information provided in Figure FSAP-2, Appendix C. Clarify exactly what will be under the CGS in this section, and provide an accurate figure. Alternatively, if Figure FSAP-2 is more accurate, reference that.
21. **Section 4.5, 5<sup>th</sup> paragraph (Page 20); Appendix B, Section 6.0 (Page 5); Appendix B, PSVP Table I; Appendix C, Section 3.3 (Page 12) and Table FSAP-1:** The work plan calls for collecting a grab sample from each 250 cubic yards of the first 1000 cubic yards of stabilized soil, and then one from each 500 cubic yards thereafter; the grab samples will be tested for TCLP lead. The Agencies prefer that the sentence be replaced with the following: collect a composite of seven (7) from each 250 cubic yards of the first 1000 cubic yards of "stabilized soil and then a composite of seven (7) grab samples from each 500 cubic yards. The (composites) samples will tested TCLP lead." If the stabilized soil is placed on-site, total lead levels shall also be analyzed.

The rationale for at least seven (7) samples in the composite is based on the statistical *t* test theory. The theory suggest that the scatter of the sample mean of a composite specimen, drops markedly as the number of specimens in the composite increases from one (1) to seven (7), but much less so as the number increases beyond seven (7). Thus, a seven (7) sample composite gives a good balance of reducing variability while keeping sampling costs reasonable.

22. **Section 4.6 (Page 21):** As stated in previous comments, this section needs to state that an appropriate base course (thickness and aggregate size distribution) will be used underneath the asphalt in any area that is off of the concrete pad, and the references to the "Pre-Final" Design specifications should be updated to "Final". Also, refer to comments on the Final Design and Construction Quality Assurance Plan (page 9) regarding the transition between areas on and off the concrete pad.
23. **Section 4.8, 1<sup>st</sup> paragraph (Page 21):** No monitoring wells are depicted in Figure 1-2. They should be added to Figure 1-2, or another reference should be provided where the monitoring well are shown.
24. **Section 4.8, 2<sup>nd</sup> paragraph (Page 21/22):** With reference to well abandonment procedures, and the proposed plan to seal the risers and screens in place: Appendix 4 of the 1996 State of Ohio Technical Guidance for Sealing Unused Wells expresses a preference for removal of the riser and screens, if technically feasible. While the mountings of these wells may be flush with the concrete, the risers only extend down about 9 feet. Thus, the Agencies recommends that a serious effort be made to remove the risers and screens, even if some of the concrete must also be removed to do so. The concrete could be readily replaced over the sealed boreholes. If the well risers absolutely cannot be extracted, then a field modification may be considered to seal them in place.
25. **Section 4.9, page 22, 1<sup>st</sup> paragraph:** The functionality of the storm water catch basins shall remain intact, post the non time critical removal actions. All applicable local codes shall be adhered to, and the run-off appropriately handled.

26. **Section 4.9, 4<sup>th</sup> paragraph (Page 22); Appendix C, Section 3.4 (Page 13); Appendix C, Section 8.0 (Page 6) and Table FSAP-1:** Data on the (total) analytical levels in the imported backfill materials must be submitted to the Agencies for a site-specific evaluation before the use of the backfill material.
27. **Section 4.9, 5<sup>th</sup> paragraph (Page 22); Appendix B, PSVP Table I; Appendix C, Section 3.4 (Page 13):** The sampling plan for the backfill material calls for composite sampling based on four (4) grab samples per source area. For the reasons stated above, the number of samples should be increased to seven (7) grab samples in each composite. Since compositing is not feasible for VOC's, the Agencies recommends that at least four (4) separate samples for each source area, or 10,000 cubic yards from a single source area be collected.
28. **Section 4.11 (page 23):** Add NOLTCO to the list of parties involved in the pre-final and final inspection.
29. **Section 5.4, bullet # 3:** Delete the reference to the Phase II groundwater monitoring plan.
30. **Figure 6-1:** A revised schedule should be provided, based on the September 25, 2002, effective date of the AOC.
31. **Appendix A:** The final (signed) copy of the AOC should be substituted for the draft copy currently in the workplan.
32. **Appendix B, PSVP Table I:** The Agencies recommend the use of global positioning software (GPS) to delineate the various areas, particularly when gridding and conducting confirmatory sampling.
33. **Appendix E: The Treatability Study,** Appendix E mentions that 2 blends of stabilizer (phosphate with cement or phosphate without cement) will be used to treat the soil. To avoid the need for a quick field decisions, and to allow for an appropriate review by the Agency, the decision process need to be explained in this appendix, clarifying which mix will be used and under what circumstances (i.e., provide a decision tree with the basis for the choice for each blend).

Finally, whichever stabilizer mix used, it will have to be evaluated by the TCLP procedure and meet the appropriate standards for the intended disposal facility.

34. **Appendix G, 1.1:** Delete the first two paragraphs and replace the two paragraphs with the following:

"The development and implementation of community activities are the responsibility of the U.S. EPA. The key community relations activities were documented in a Community Relations Plan prepared by U. S. EPA, April 1999. All MMI PRP-conducted community relations activities will be subject to oversight by the U.S. EPA, in coordination with Ohio EPA.

During the Public Comment Period of 1999, a request was made to U.S. EPA, Ohio EPA, and the Respondent by the City of Cleveland's Economic Development Office on the behalf of NOLTCO to consider the possibility of returning the Master Metals Facility back to productive use. The Action Memorandum (the clean up remedy decision document) was



approved September 1999. Although protective of human health and the environment, the clean up remedy was unsuitable for NOLTCO's reuse of the facility. Therefore, another Action Memorandum for the non time critical removal action was approved for the Master Metals Site. The first Action Memorandum of September 1999 for the non time critical removal action was to excavate and treat the soils, and consolidate the treated soils on-site underneath a geo-membrane and vegetative soil cover. The second and final Action Memorandum, September 2000, was approved to change the project scope from a geo-membrane and vegetative soil cover to an asphalt cover to accommodate the redevelopment of the site by NOLTCO. After the long negotiations between the interested stakeholders an agreement was reached and the AOC for the non-time critical removal action became effective on September 25, 2002.

An updated Overview of Community Relations Plan is presented here. This plan contains the following sections:"

35. **Appendix G, 1.8 , List of Contacts:** Correct the spelling of Massenburg, and also in the email address. Delete the contact information for Mr. Casey and Mr. Stoub.

#### **MARCH 2002 FINAL DESIGN AND CONSTRUCTION QUALITY ASSURANCE PLAN**

36. **General Comment:** The Agency assumes that the topographical survey (Figure 02) is accurate, and reflects all relevant site conditions. Further, the Agency assumes that NOLTCO is in agreement with the concrete refurbishment and asphalt plan in Figure 04, and has reviewed the Surtreat Technical Data Sheets in Appendix C. Specific feedback from NOLTCO sent to the Agencies is provided below.
37. **Section 2.13, Asphalt (page 9):** The Agency has been notified by NOLTCO about language that was provided in their January 24, 2002 letter to the PRP contractor and should be included in the design documents to facilitate appropriate site reuse. Specifically, the following language needs to be added in, at the end of the sentence, (after "...of 1 ½ to 2 inches"): "and approximately 4 to 6 feet in width. This edge shall be sealed using ODOT quality crack fill/ sealer."
38. **Appendix B:** With respect to the soil volume calculations, it is the Agency's position that the volume of soil anticipated to be excavated is simply an estimate; the performance standards in the SOW must be achieved irrespective of volumes excavated.

*End of the Agencies comments on the Master Metals March 2002 RD/RA Workplan, Final Design and Construction Quality Plan.*